IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

TruePosition, Inc.,   )
)
    Plaintiff/   )
    Counterclaim-Defendant,   )
)   Civil Action No. 05-747-SLR
    v.   )
)
Andrew Corporation,   )
)
    Defendant/   )
    Counterclaim-Plaintiff.   )
)

APPENDIX C
TO
TRUEPOSITION'S BRIEF IN SUPPORT OF ITS MOTION FOR SUMMARY JUDGMENT ON ANDREW'S COUNTERCLAIMS II-VI AND AFFIRMATIVE DEFENSES III-V
PART 2
C43-C76

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APPENDIX C

TO

TRUEPOSITION'S BRIEF IN SUPPORT OF ITS MOTION FOR SUMMARY JUDGMENT ON ANDREW'S COUNTERCLAIMS II-VI AND AFFIRMATIVE DEFENSES III-V
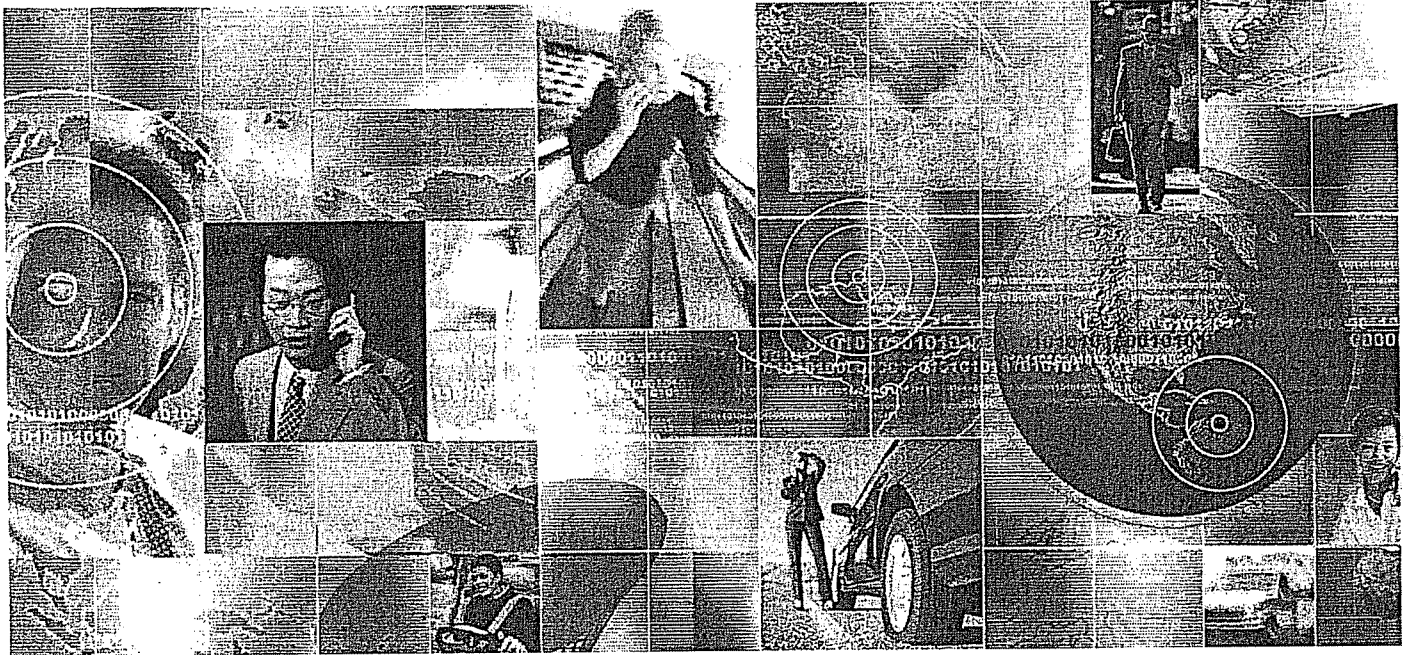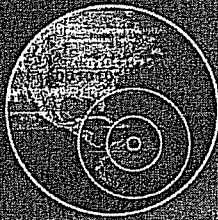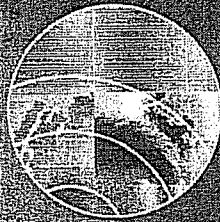
PART 2

C43-C76

ANDREW®

Geometrix®
Mobile Location Center

Complete Mobile Location
Unmatched Flexibility

C43

One Company. A World of Solutions.

Geometrix®

Complete Mobile Location
Unmatched Flexibility

Support for all location-enhanced services

SMLC, GMLC, and SAS options

Commercial LBS, public safety, and security configurations

A-GPS, CID, E-CID, Matrix, and U-TDOA options

High-availability hardware platform

Andrew Corporation's Geometrix is the most comprehensive and flexible mobile locating system available. Geometrix can provide handset-based, network-based, and hybrid locating technologies. Geometrix offers SMLC, GMLC, and SAS nodes, as well as the simplified operations of combined GMLC/SMLC and GMLC/SAS systems from a common centralized platform Geometrix is highly scalable and upgradeable to provide operators with unprecedented flexibility to meet their wireless location support requirements. Simplified upgrade paths ease migration to new location methods if and when they are required.

Andrew's Geometrix is the state-of-the-art mobile location solution that can provide optimum support for all location-enhanced applications, present and future Operators have recognized our system's superiority and have selected Geometrix more than any other competing product Network infrastructure vendors as well have recognized the Geometrix advantage· multiple mobile network manufacturers have chosen Andrew as the preferred supplier of their mobile location solutions.

CONTENTS

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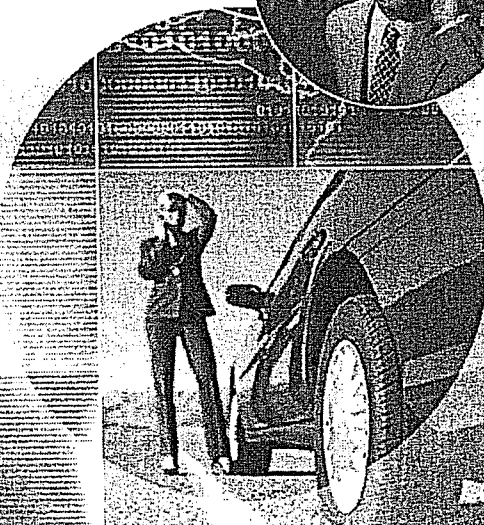
Geometrix™ Key Benefits

OEM Selection

Andrew Corporation is a leading supplier of wireless equipment to the global telecommunications infrastructure market. Andrew's divisions produce a broad line of wireless infrastructure products from ISO 9001 certified manufacturing facilities Just as Andrew provides many of its products on an OEM basis to the world's largest network infrastructure vendors, leading wireless network vendors have selected Andrew as their supplier of wireless location systems.

Optimum LBS Support

Each location-enhanced application or location-based service (LBS) presents unique requirements for mobile location support Because Geometrix can provide all handset-based and network-based mobile location methods, it can provide the optimum location technology for all location-based services and applications. Geometrix allows operators to install a single location system and select the locating technologies that best meet their LBS performance and cost requirements. With Geometrix, operators can be confident that they have selected the best location system for current and future needs.
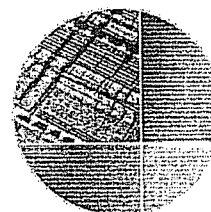
Adapts With Network Upgrades

An investment in Geometrix is sound, Geometrix can transition seamlessly to support multiple network technologies as networks upgrade, expand, and add new capabilities. Total flexibility means that operators can select a Geometrix SMLC and/or GMLC for GSM support and later transition to UMTS support from the same Geometrix location system platform. Geometrix offers SMLC, GMLC, and SAS standards-based components, can provide A-GPS, CID, E-CID, Matrix, and U-TDOA locating technologies, and is compatible with GSM/GPRS and UMTS networks. Geometrix supports TIA J-STD-036 and 3GPP/GSM standards-based interfaces and has certified interoperability.

Proven Performance

Geometrix addresses all location system performance dimensions: location accuracy, yield, speed of location, and operational consistency across varying environments Geometrix has established its performance reputation through years of commercial operation in large and small wireless networks in urban, suburban, and rural environments. Geometrix meets or exceeds the most stringent public safety performance requirements. Geometrix components are implemented on carrier-grade, high-availability processing hardware with site level and geographic redundancy options.

Unparalleled GSM Experience

Andrew supplies Geometrix to a broad base of national, regional, and local GSM wireless operators—more than any competing high-accuracy location system Geometrix has been certified by all major wireless network infrastructure vendors and was the first high-accuracy mobile location system to locate emergency callers in commercial service Andrew has extended Geometrix benefits to include support for UMTS networks.

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Geometrix® Features
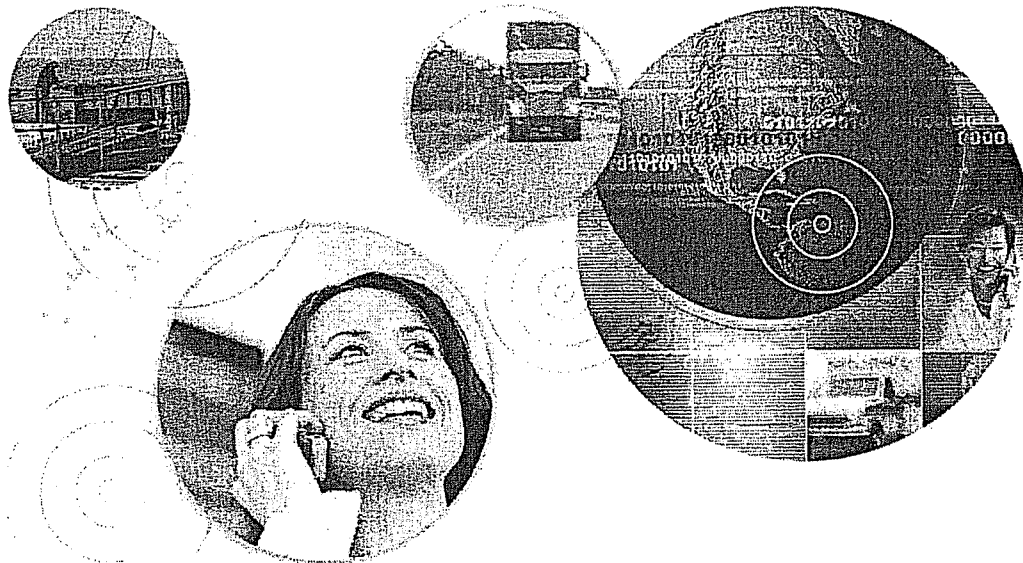
GMLC
Geometrix offers a fully featured GMLC for GSM and UMTS networks. Geometrix SMLCs and GMLCs can share the same modular hardware platform. Key GMLC options include advanced privacy control and quality of service

SMLC
Geometrix offers full SMLC functionality, including Lb and Lbis support. Geometrix SMLCs and GMLCs can share the same modular hardware platform. SMLC and other MLC nodes feature integrated SS7 and IP networking elements.

SAS
For UMTS networks, Geometrix offers complete stand-alone SMLC functionality. The Geometrix SAS can share the same hardware platform as the Geometrix GMLC.

LMU
Geometrix Location Measurement Units are deployed at selected base station sites in connection with the U-TDOA option. Geometrix LMUs can support multiple network technologies, frequency ranges, and networks.

High Availability and Scalability
Geometrix SMLC, GMLC, and SAS nodes are implemented on high-availability carrier-grade hardware platforms offering site- or geographic level redundancy. The nodes are highly scalable to enable capacity growth as applications and system usage increase

All Location Technologies
Geometrix can provide A-GPS, Matrix, CID, E-CID, and U-TDOA wireless location technologies, individually or in combination in a single Geometrix location system Geometrix is the only mobile locating system that can provide the best match of location technology to location services.

No-Compromise LBS Support
Geometrix can provide the most effective and cost-efficient location techniques to meet the requirements of location sensitive commercial LBS, public safety, and security applications operators may wish to implement Geometrix offers the most complete complement of locating technologies ever incorporated in a single wireless location system.

All Network Technologies
Geometrix can support GSM, GPRS, UMTS, IS-95(CDMA), CDMA2000, IS-136 (TDMA), and AMPS network technologies, all mobile frequency bands, and any combination of air interfaces.

Acronyms
A-GPS . . . . Assisted Global Positioning System
AMPS. . . . . Advanced Mobile Phone Service
BSC . . . . Base Station Controller
BTS . . . . Base Transceiver Station
CDMA . . . . Code Division Multiple Access
CID. . . . . Cell Identity
E-CID. Enhanced Cell Identity
E-OTD . . . . Enhanced-Observed Time Difference
GMLC . . . . Gateway Mobile Location Center
GPRS . . . . General Packet Radio Service
GPS . . . . Global Positioning System
GSM . . . . Global System for Mobile communications
LBS. . . . . Location-Based Services
LMU. . . . . Location Measurement Unit
MLC . . . . Mobile Location Center
MSC . . . . Mobile services Switching Center
PDE . . . . Position Determining Entity
SAS . . . . Stand-alone SMLC
SMLC . . . . Serving Mobile Location Center
TDMA . . . . Time Division Multiple Access
TDOA. . . . . Time Difference of Arrival
TOA. . . . . Time of Arrival
UMTS. . . . Universal Mobile Telecommunications Service
U-TDOA. . . . . Uplink Time Difference of Arrival

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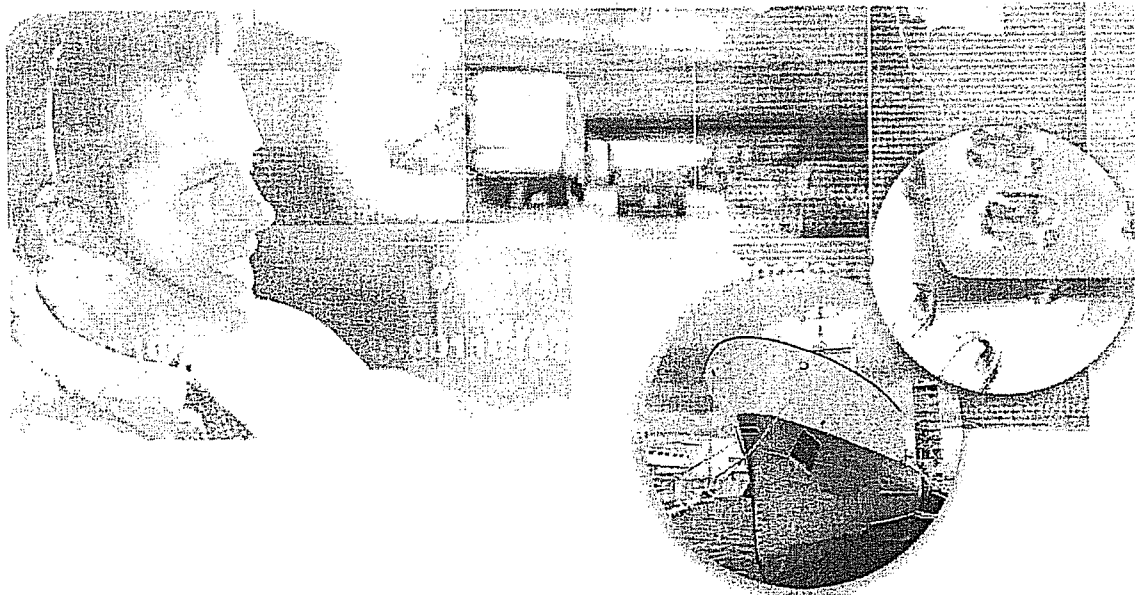
The Geometrix® Advantage:
One System—All Locating Methods

Each location-sensitive service or application presents its own challenges in terms of required location accuracy, latency, reliability, cost tolerance, and other parameters. Similarly, each mobile locating technology has its own attributes and limitations in terms of performance, cost, and deployment requirements. Only a location system as comprehensive as Geometrix can apply the optimum location methods to support all location-based services.

Geometrix can be specifically tailored to support an operator's deployment plan for LBS. That plan might vary within subsets of the operator's service area, driven by factors such as: mobile or population density; concentration of enterprises; consumer base demographics; incidence of traffic tie-ups; requests from emergency service bureaus; and security agency initiatives. With Geometrix, locating technologies can be varied according to the LBS services and applications an operator implements in particular sub-areas.

Geometrix is scaleable and upgradeable; Geometrix systems can be supplemented to incorporate additional locating methods, to increase coverage, or to augment capacity.

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Location-Sensitive Services and Applications
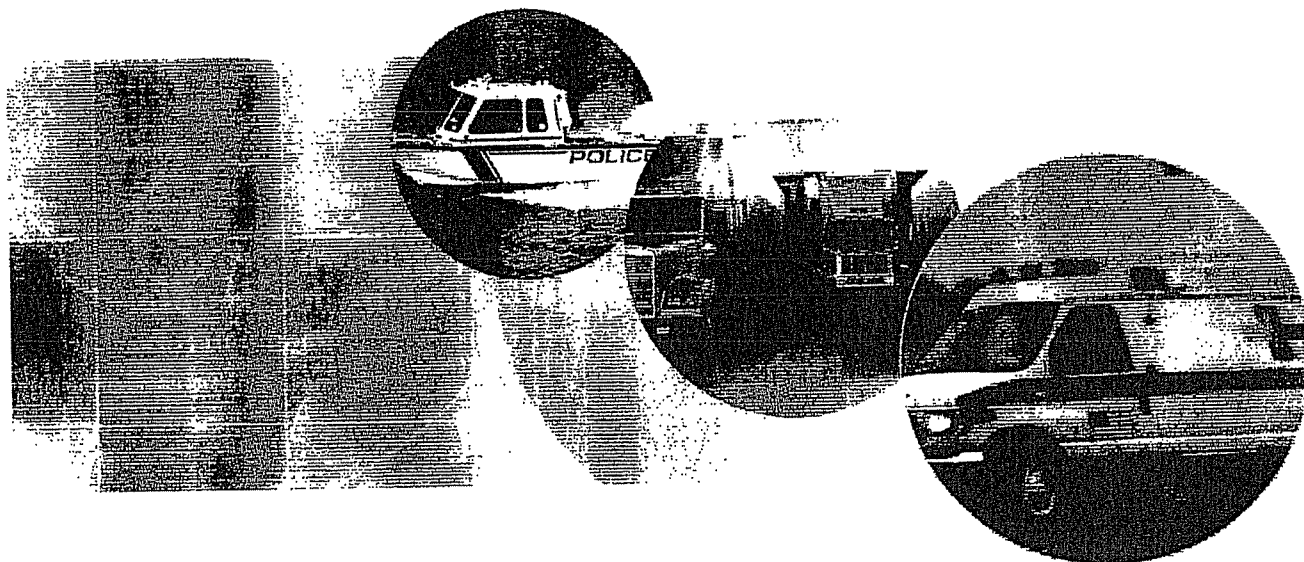
Location-sensitive services and applications are best supported by location systems that accommodate these services' strikingly different requirements. There is no individual mobile locating method that is best suited to all applications. By having a complete selection of locating options deployable in one location system, operators can benefit from the most effective cost and performance relationship attainable.

Geometrix® provides high-accuracy mobile location support for all categories of applications:

Enterprise and Consumer Location-Based Services

Mobile network operators and third parties offer commercial value-added services that require knowing the position of mobiles, mobile devices, or fixed assets. For example, enterprise users may want to know the precise location of inventory, goods, or other assets in transit, or of key personnel.

Dispatchers can easily track delivery vehicles without driver intervention. Parents can determine the whereabouts of their children or can be alerted if they wander from pre-established boundaries. Mobile consumers can determine "Where is the nearest ATM (to my current location)?" or "How far away is my friend XYZ?" or "What are the traffic conditions in my vicinity?" Geometrix provides mobile locating support for all commercial LBS applications.

Public Safety

Geometrix can accurately determine within seconds the position of mobiles calling 112, 911, fire brigade, police, or other emergency numbers. Several public safety configurations are available.

Security

Geometrix can be specially configured to meet the unique requirements associated with security applications. For additional information, please contact an Andrew representative.

Andrew Corporation's Geometrix can provide the most comprehensive array of locating technology options ever offered.

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Geometrix® Location Technologies
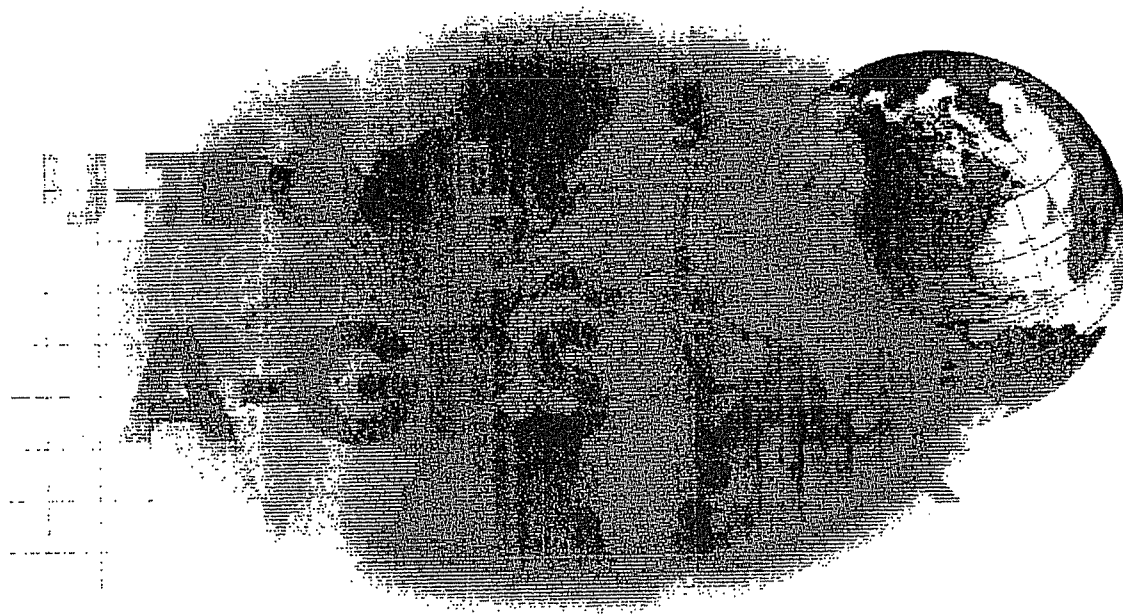
Assisted GPS

Geometrix Assisted Global Positioning System (A-GPS) is a handset-based mobile locating method based on GPS technology. Handsets must be specially equipped to receive and measure GPS signals from multiple GPS satellites and to relay this information to the Geometrix Mobile Location Center. The MLC receives location calculations from a target mobile or uses GPS data measured by the mobile to compute the mobile's position. A-GPS is a supplemented form of GPS in which the Geometrix system sends "assist" information to a target mobile informing the mobile from which GPS satellites it should attempt to acquire data. The purpose of the assist information is to speed the mobile's satellite signal acquisition process, reduce latency, and improve other location performance when a mobile's

view of GPS satellites is obscured (for example, when the caller is in a building, a vehicle, or an "urban canyon").

A-GPS can be highly accurate; however, accuracy, latency, and yield performance can degrade when a mobile's reception of GPS satellite signals is impaired. A-GPS capacity is highly scalable within a Geometrix system.

Cell Identity

Geometrix Cell Identity (CID) can provide the location of the cell/cell sector in which the target mobile is located.

Enhanced Cell Identity

Geometrix Enhanced Cell Identity (E-CID) uses cell/sector identity and timing advance/network measurement reporting (TA/NMR) information to estimate mobile locations with better accuracy than cell identity alone. Attainable accuracy with E-CID is highly dependent on the density of base station sites (accuracy increases with site density in the coverage area). In urban networks where base station sites are closely spaced, E-CID can deliver average accuracy within a tolerance of several hundred meters. In rural networks where cells can be widely separated, E-CID accuracy error can increase to several kilometers. E-CID works with all mobiles and is a low cost, high-yield, high-capacity solution.

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Matrix

A Geometrix® SMLC equipped with Matrix computes positions based on the arrival time of synchronization burst signals from multiple BTS sites as received and measured at the target mobile. The target mobile sends these measurements through the wireless network to the Geometrix SMLC where software calculates the target mobile's position using time difference of arrival principles. Matrix establishes a common time reference by means of TOA measurements of the BTS sync signals at multiple mobiles in the area. The measurements are used to calculate a time reference grid, or Matrix. Matrix requires that target mobiles be E-OTD capable. Matrix uses E-OTD locating methods, but unlike earier E-OTD systems, does not require deployment of LMUs.
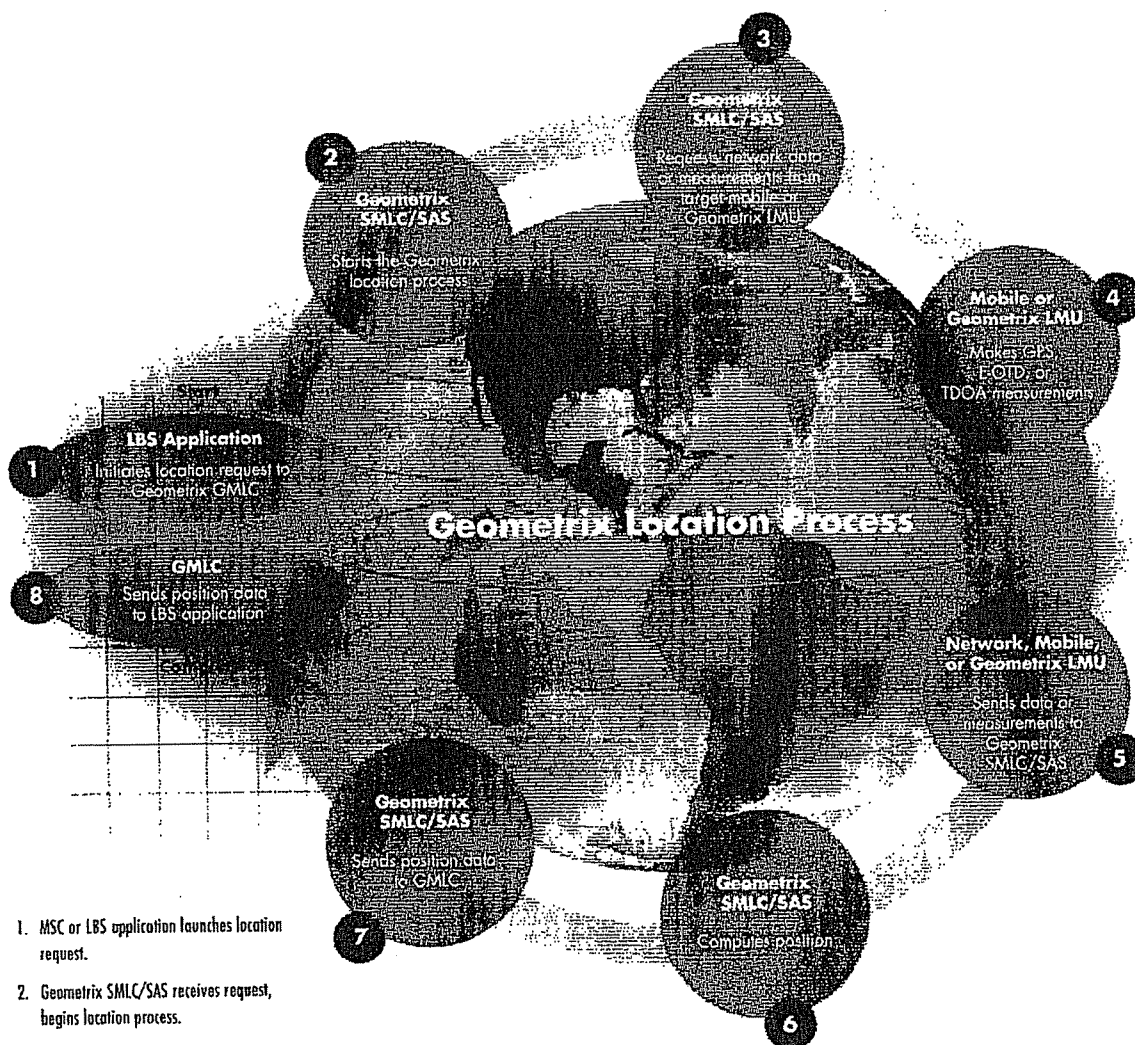
Uplink Time Difference of Arrival

Geometrix Uplink Time Difference of Arrival (U-TDOA) is a network-based means of calculating a mobile's position based on the difference in time required for a target mobile's signal to reach different BTS sites. The arrival time measurements are made by location measuring units (LMUs) installed at selected BTS sites (one Geometrix LMU per selected site).The LMUs forward the signal arrival time measurements to a Geometrix U-TDOA server, which calculates mobile positions. U-TDOA works with all mobiles and requires that the target mobile's signal can be measured by at least three LMUs. Geometrix LMUs employ sophisticated signal processing to increase their sensitivity in order to measure signals from distant mobiles. U-TDOA location performance is consistent under a wide variety of conditions.

Geometrix can transition seamlessly to support multiple network technologies as networks upgrade, expand, and add new capabilities.

Workforce Management
Child Locator
Security
Service Dispatch
Business Locator
Navigation/Routing
Traffic Reports
Medical Emergency
Public Safety
Roadside Assistance
Package/Cargo Tracking
Fleet Management

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Typical Geometrix® System Operation

1. MSC or LBS application launches location request.

2. Geometrix SMLC/SAS receives request, begins location process.

3. SMLC/SAS queries network (for E-CID), target mobile (for A-GPS, Matrix), or U-TDOA PDE (for U-TDOA) for measurement or other data.

4. Mobile captures GPS or E-OTD measurements, or Geometrix LMU (for U-TDOA only) measures target mobile signal.

5. Mobile (for A-GPS, Matrix) or Geometrix LMU (U-TDOA) sends measurements to Geometrix SMLC/SAS.

6. Geometrix SMLC/SAS receives measurements and computes position.

7. Geometrix SMLC/SAS sends position data to GMLC (through BSC and MSC).

8. GMLC sends position data to LBS application.

Operation for Typical Locations

In most applications, Geometrix location activity is initiated by an application external to the Geometrix system itself (the initiation usually is received by a GMLC, in response to an application's request for a location). Similarly, at the end of the location process, Geometrix usually returns calculated mobile position information through a GMLC to the application that initiated the location activity or, in the case of public safety applications, to the appropriate emergency service center or public safety answering point. The operation of the Geometrix system is rapid, accurate, and reliable; locating a mobile usually requires only a few seconds.

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Geometrix®

The Complete Mobile Location System — Unmatched Flexibility for Any Application

Geometrix offers the most versatile and cost-effective approach to operators who wish to support any location-sensitive service or application.

Geometrix is the complete mobile location system that gives operators the option of deploying any handset-based or network-based location technology—individually or in combination.

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

TruePosition, Inc.	)	
	)	
Plaintiff/,	)	
Counterclaim-Defendant,	)	Civil Action No. 05-00747-SLR
	)	
v.	)	
	)	
Andrew Corporation,	)	
	)	
Defendant/.	)	
Counterclaim-Plaintiff.	)	
	)	

TRUEPOSITION'S THIRD SET OF
INTERROGATORIES TO ANDREW (NOS. 21-25)

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Plaintiff TruePosition, Inc.

("TruePosition") requests that Defendant Andrew Corporation ("Andrew") answer, under oath,

the following interrogatories within thirty (30) days of the service date hereof.

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DEFINITIONS AND INSTRUCTIONS

TruePosition incorporates by reference the Definitions and Instructions in TruePosition's First and Second Sets of Interrogatories to Andrew Corporation (Nos. 1-20).

In addition, the following terms are defined:

"3GPP" shall mean the 3rd Generation Partnership Project referred to by Andrew in its Counterclaims;

"GERAN" shall mean GSM Edge Radio Access Network as defined by 3GPP and as referred to by Andrew in its Counterclaims; and

"UTRAN" shall mean Universal Terrestrial Radio Access Network as defined by 3GPP and as referred to by Andrew in its Counterclaims.

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INTERROGATORIES

Interrogatory No. 21

Separately identify by Bates and/or production number(s) the final, executed version of Andrew's December 2004 response to STC's GSME7 Value Added Services (VAS) Tender, and the final, executed version of any additional or supplemental responses by Andrew to STC directly related to such Tender, including but not limited to any additional or supplemental responses that altered the scope of Andrew's December 2004 response, and any additional or supplemental responses that altered or amended the pricing contained in Andrew's December 2004 response. If Andrew has produced multiple copies of the same final, executed response to STC, Andrew shall identify the copies as such. If Andrew has not produced an executed copy of a final version of a response to STC, then Andrew shall identify the final version of such response in the manner noted above.

Interrogatory No. 22

Separately identify by Bates and/or production number(s) the final, executed versions of all contracts between Andrew and STC directly related to the provision of Cellular Telephone Location Systems, including equipment and/or services used in with such Systems, and the English translations thereof, if any, and all final, executed versions of contracts proposed by Andrew to STC directly related to the provision of such Systems, equipment and/or services, including but not limited to the contract between Andrew and STC executed by Mr. Terry Garner in or about February 2006, any contract(s) directly related to the provision of such Systems, equipment and/or services executed between Andrew and STC subsequent to February 2006, and any contract(s) directly related to the provision of such Systems, equipment and/or services proposed by Andrew to STC subsequent to February 2006. If Andrew has produced multiple copies of the same final, executed contract(s) with STC or proposed to STC, Andrew shall identify the copies as such. If Andrew has not produced an executed copy of a final version of a contract it has with STC or has proposed to STC, then Andrew shall identify the final version of such contract in the manner noted above.

C56

Interrogatory No. 23

Separately identify by Bates and/or production number(s) the final, executed version of any proposal by Andrew to provide Cellular Telephone Location Systems that includes equipment and/or software having the capability or functionality, whether purportedly disabled or not, to locate wireless mobile devices transmitting energy or information on a control channel (including a SDCCH) utilizing uplink time difference of arrival techniques, and state separately with respect to each such proposal whether Andrew has received any indication, written or otherwise, that the proposal has been accepted or awarded to Andrew, whether Andrew has or is engaged in contract negotiations directly related to the proposal, whether any contract has been executed by Andrew directly related to the proposal, and the Bates and/or production number(s) where the final, executed version(s) of such contract(s) may be found. If Andrew has produced multiple copies of the same final, executed proposal or contract to provide such Cellular Telephone Location Systems, Andrew shall identify the copies as such. If Andrew has not produced an executed copy of a final version of such proposal(s) or contract(s), then Andrew shall identify the final version of such proposal(s) or contract(s) in the manner noted above.

Interrogatory No. 24

Describe separately the status of Andrew's deployment of Cellular Telephone Location Systems at each of the following entities: STC, ICT/Q-Tel, and any other cellular or wireless network operator where the equipment and/or software being deployed or to be deployed by or on behalf of Andrew includes the functionality, whether purportedly disabled or not, to locate a wireless mobile device transmitting energy or information on a control channel (including a SDCCH). The description shall include separately for each entity, at a minimum, the name of the entity, the number of Geolocation Control Systems or GCSs shipped or provided to the entity, the number of Geolocation Control Systems or GCSs installed in a cellular or wireless network owned, operated or controlled by the entity, the number of Geolocation Control Systems or GCSs that are available for use by some person other than Andrew or its agents or representatives to locate wireless mobile devices operating in a cellular or wireless network(s) owned, operated or controlled by the entity, the Release of Geometrix Software installed on each Geolocation Control System or GCS supplied, installed and/or available for use by some person other than Andrew or its agents or representatives to locate wireless mobile devices operating in

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a cellular or wireless network(s) owned, operated or controlled by the entity, the number of Wireless Location Sensors or WLSs/Location Measurement Units or LMUs by version and model number shipped or supplied to the entity, the number of Wireless Location Sensors or WLSs/Location Measurement Units or LMUs by version and model number installed in a cellular or wireless network owned, operated or controlled by the entity, the number of Wireless Location Sensors or WLSs/Location Measurement Units or LMUs by version and model number available for use by some person other than Andrew or its agents or representatives to locate wireless mobile devices operating in a cellular or wireless network owned, operated or controlled by the entity, the number of Abis Monitoring Units or AMUs shipped or provided to the entity, the number of Abis Monitoring Units or AMUs installed in a cellular or wireless network owned, operated or controlled by the entity, the number of Abis Monitoring Units or AMUs available for use by some person other than Andrew or its agents or representatives to locate wireless mobile devices operating in a cellular or wireless network owned, operated or controlled by the entity, the number of Location Based Services or LBS Applications or Clients shipped or provided to the entity, the number of Location Based Services or LBS Applications or Clients installed in a cellular or wireless network owned, operated or controlled by the entity, the number of Location Based Services or LBS Applications or Clients available for use by some person other than Andrew or its agents or representatives to locate wireless mobile devices operating in a cellular or wireless network owned, operated or controlled by the entity, the number of Location Services or LCS Security Applications or Clients shipped or provided to the entity, the number of Location Services or LCS Security Applications or Clients shipped or provided to some person other than Andrew or its agents or representatives for use by such other person in locating wireless mobile devices operating in a cellular or wireless network owned, operated or controlled by the entity, the name of such person other than Andrew or its agents or representatives, the number of Location Services or LCS Security Applications or Clients installed in a cellular or wireless network owned, operated or controlled by the entity, the number of Location Services or LCS Security Applications or Clients available for use by some person other than Andrew or its agents or representatives to locate wireless mobile devices operating in each entity's network(s), and the name of such person other than Andrew or its agents or representatives.

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Interrogatory No. 25

State whether Andrew contends that the "system for determining the location of a mobile phone" supplied by Andrew to STC "implement[s] the U-TDOA standards that had been jointly proposed by TruePosition and Andrew and adopted by 3GPP," including whether Andrew contends such system implements "U-TDOA standards" adopted by 3GPP Technical Specification Group GERAN or 3GPP Technical Specification Group UTRAN and whether Andrew contends that the Lbis interface utilized in the system is defined in such "U-TDOA standards," state the factual basis for such contention, and state the factual basis for Andrew's contention that it "submitted a bid to STC to provide a system for determining the location of a mobile phone that implemented the U-TDOA standards that had been jointly proposed by TruePosition and Andrew and adopted by 3GPP," including the factual basis for contending that utilization of an "Abis Monitoring Unit (AMU)" in the system proposed by Andrew in the bid implemented such "U-TDOA standards" and the factual basis for contending that utilization of an "Lbis interface" in the system proposed by Andrew in the bid implemented such "U-TDOA standards" (*see, e.g.,* paragraphs 23 and 29 of the Counterclaim section of Andrew Corporation's Answer and Counterclaim to Second Amended Complaint *and* sections 1.0 ("Executive Summary") and 2.1 ("Architecture") in Volume 7 of Andrew's December 2004 Commercial Tender Response to STC (AND_EF0000408)).

Dated: October 18, 2006

        /s/ James D. Heisman

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(215) 568-3100
Attorneys for Plaintiff, TruePosition Inc.

C59

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

TruePosition, Inc.	)	
	)	
Plaintiff/,	)	
Counterclaim-Defendant,	)	Civil Action No. 05-00747-SLR
	)	
v.	)	
	)	
Andrew Corporation,	)	
	)	
Defendant/.	)	
Counterclaim-Plaintiff.	)	
	)	

CERTIFICATE OF SERVICE

I, James D. Heisman, certify that I caused a true and correct copy of TruePosition's Third Set of Interrogatories to Andrew (Nos. 21-25) to be served on the following attorneys for defendant, Andrew Corporation, in the manner indicated:

VIA HAND DELIVERY

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VIA ELECTRONIC MAIL

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/s/ James D. Heisman
James D. Heisman (# 2746)

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

TRUEPOSITION INC.,	)	
	)	
PLAINTIFF/	)	
COUNTERCLAIM- DEFENDANT,	)	
	)	
	)	
v.	)	CIVIL ACTION NO. 05-00747-SLR
	)	
ANDREW CORPORATION,	)	
	)	
DEFENDANT/	)	
COUNTERCLAIM-PLAINTIFF.	)	

ANDREW CORPORATION'S RESPONSES TO
TRUEPOSITION'S THIRD SET OF INTERROGATORIES

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Andrew Corporation hereby

responds to TruePosition's Third Set of Interrogatories. Pursuant to Rule 26(e) of the Federal

Rules of Civil Procedure, Andrew expressly reserves the right to supplement these responses

further.

Interrogatory No. 21

Separately identify by Bates and/or production number(s) the final, executed version of
Andrew's December 2004 response to STC's GSME7 Value Added Services (VAS) Tender, and
the final, executed version of any additional or supplemental responses by Andrew to STC
directly related to such Tender, including but not limited to any additional or supplemental
responses that altered the scope of Andrew's December 2004 response, and any additional or
supplemental responses that altered or amended the pricing contained in Andrew's December
2004 response. If Andrew has produced multiple copies of the same final, executed response to
STC, Andrew shall identify the copies as such. If Andrew has not produced an executed copy of
a final version of a response to STC, then Andrew shall identify the final version of such
response in the manner noted above.

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Response:

Andrew objects to the phrases "final, executed version" and "any additional or supplemental responses" as vague, ambiguous, and confusing. Furthermore, Andrew objects to this Interrogatory as overbroad as it asks Andrew to identify all multiple copies of the requested documents. Under Federal Rule of Civil Procedure 33(d), the burden of identifying all duplicate documents is substantially the same for both parties. Subject to and without waiving its Specific and General Objections, Andrew will identify one copy of its response to STC's GSME7 Value Added Services (VAS) Tender: AND_EF000135, AND_EF001192 to AND_EF001220, AND_EF001223 to AND_EF001227, AND_EF002080, and AND_EF002095.

Interrogatory No. 22

Separately identify by Bates and/or production number(s) the final, executed versions of all contracts between Andrew and STC directly related to the provision of Cellular Telephone Location Systems, including equipment and/or services used in with such Systems, and the English translation thereof, if any, and all final, executed versions of contracts proposed by Andrew to STC directly related to the provision of such Systems, equipment and/or services, including but not limited to the contract between Andrew and STC executed by Mr. Terry Garner in or about February 2006, any contract(s) directly related to the provision of such Systems, equipment and/or services executed between Andrew and STC subsequent to February 2006, and any contract(s) directly related to the provision of such Systems, equipment and/or services proposed by Andrew to STC subsequent to February 2006. If Andrew has produced multiple copies of the same final, executed contract(s) with STC or proposed to STC, Andrew shall identify the copies as such. If Andrew has not produced an executed copy of a final version of a contract it has with STC or has proposed to STC, then Andrew shall identify the final version of such contract in the manner noted above.

Response:

Andrew objects to the phrases "final, executed version," "final version," and "directly related," and the Interrogatory in general, as vague, ambiguous, and confusing. Furthermore, Andrew objects to this Interrogatory as overbroad as it asks Andrew to identify all multiple copies of the requested documents. Under Federal Rule of Civil Procedure 33(d), the burden of identifying all duplicate documents is substantially the same for both parties. Subject to and

without waiving its Specific and General Objections, Andrew will identify one copy of the following contracts with STC: AND0073827-AND0073831 and AND_EF0121696.

Interrogatory No. 23

Separately identify by Bates and/or production number(s) the final, executed version of any proposal by Andrew to provide Cellular Telephone Location Systems that includes equipment and/or software having the capability or functionality, whether purportedly disabled or not, to locate wireless mobile devices transmitting energy or information on a control channel (including a SDCCH) utilizing uplink time difference of arrival techniques, and state separately with respect to each such proposal whether Andrew has received any indication, written or otherwise, that the proposal has been accepted or awarded to Andrew, whether Andrew has or is engaged in contract negotiations directly related to the proposal, whether any contract has been executed by Andrew directly related to the proposal, and the Bates and/or production number(s) where the final, executed version(s) of such contract(s) may be found. If Andrew has produced multiple copies of the same final, executed proposal or contract to provide such Cellular Telephone Location Systems, Andrew shall identify the copies as such. If Andrew has not produced an executed copy of a final version of such proposal(s) or contract(s), then Andrew shall identify the final version of such proposal(s) or contract(s) in the manner noted above.

Response:

Andrew objects to this Interrogatory on the grounds that it is overbroad and requests

information that is irrelevant to this litigation and nor reasonably calculated to lead to the

discovery of admissible evidence. Andrew also objects that the phrase, "final, executed version

of any proposal," the definition of "Cellular Telephone Location Systems that includes

equipment and/or software having the capability or functionality, whether purportedly disabled

or not, to locate wireless mobile devices transmitting energy or information on a control channel

(including a SDCCH) utilizing uplink time difference of arrival techniques", and the

Interrogatory in general are vague, ambiguous, and confusing. For purposes of this

Interrogatory, Andrew will interpret "Cellular Telephone Location Systems that includes

equipment and/or software having the capability or functionality, whether purportedly disabled

or not, to locate wireless mobile devices transmitting energy or information on a control channel

(including a SDCCH) utilizing uplink time difference of arrival techniques" as an UTDOA

Cellular Telephone Location System. Additionally, Andrew objects to this Interrogatory as containing multiple discrete subparts, which would cause TruePosition to exceed the maximum number of written Interrogatories allowed under Rule 33(a) of the Federal Rules of Civil Procedure.   Subject to and without waiving its Specific and General Objections, Andrew states that it has produced all proposals in its possession, and under Rule 33(d), the burden of identifying all proposals in Andrews production is substantially the same for both parties. Andrew will limit the remainder of its response to its proposal with STC, and consider its answer to this discrete subpart as an answer to an additional interrogatory.

- Andrew submitted a proposal for an UTDOA Cellular Telephone Location System.

- Andrew has received indication that the proposal was accepted.

- Andrew has been involved in contract negotiations directly related to the proposal.

- Andrew refers TruePosition to its responses to Interrogatories No. 21 and 22.

Interrogatory No. 24

Describe separately the status of Andrew's deployment of Cellular Telephone Location Systems at each of the following entities: STC, ICT/Q-Tel, and any other cellular or wireless network operator where the equipment and/or software being deployed or to be deployed by or on behalf of Andrew includes the functionality, whether purportedly disabled or not, to locate a wireless mobile device transmitting energy or information on a control channel (including a SDCCH). The description shall include separately for each entity, at a minimum, the name of the entity, the number of Geolocation Control Systems or GCSs shipped or provided to the entity, the number of Geolocation Control Systems or GCSs installed in a cellular or wireless network owned, operated or controlled by the entity, the number of Geolocation Control Systems or GCSs that are available for use by some person other than Andrew or its agents or representatives to locate wireless mobile devices operating in a cellular or wireless network(s) owned, operated or controlled by the entity, the Release of Geometrix Software installed on each Geolocation Control System or GCS supplied, installed and/or available for use by some person other than Andrew or its agents or representatives to locate wireless mobile devices operating in a cellular or wireless network(s) owned, operated or controlled by the entity, the number of Wireless Location Sensors or WLSs/Location Measurement Units or LMUs by version and

model number shipped or supplied to the entity, the number of Wireless Location Sensors or WLSs/Location Measurement Units or LMUs by version and model number installed in a cellular or wireless network owned, operated or controlled by the entity, the number of Wireless Location Sensors or WLSs/Location Measurement Units or LMUs by version and model number available for use by some person other than Andrew or its agents or representatives to locate wireless mobile devices operating in a cellular or wireless network owned, operated or controlled by the entity, the number of Abis Monitoring Units or AMUs shipped or provided to the entity, the number of Abis Monitoring Units or AMUs installed in a cellular or wireless network, owned, operated or controlled by the entity, the number of Abis Monitoring Units or AMUs available for use by some person other than Andrew or its agents or representatives to locate wireless mobile devices operating in a cellular or wireless network owned, operated or controlled by the entity, the number of Location Based Services or LBS Applications or Clients shipped or provided to the entity, the number of Location Based Services or LBS Applications or Clients installed in a cellular or wireless network owned, operated or controlled by the entity, the number of Location Based Services or LBS Applications or Clients available for use by some person other than Andrew or its agents or representatives to locate wireless mobile devices operating in a cellular or wireless network owned, operated or controlled by the entity, the number of Location Services or LCS Security Applications or Clients shipped or provided to the entity, the number of Location Services or LCS Security Applications or Clients shipped or provided to some person other than Andrew or its agents or representatives for use by such other person in locating wireless mobile devices operating in a cellular or wireless network owned, operated or controlled by the entity, the name of such person other than Andrew or its agents or representatives, the number of Location Services or LCS Security Applications or Clients installed in a cellular or wireless network owned, operated or controlled by the entity, the number of Location Services or LCS Security Applications or Clients available for use by some person other than Andrew or its agents or representatives to locate wireless mobile devices operating in each entity's network(s), and the name of such person other than Andrew or its agents or representatives.

Response:

Andrew objects to this Interrogatory on the grounds that it requests information that is irrelevant to this litigation and is not reasonably calculated to lead to the discovery of admissible evidence. Andrew also objects that the phrases "Geolocation Control Systems," "status," and "control channel" and this Interrogatory in general are vague, ambiguous, and confusing. Additionally, Andrew objects to this Interrogatory as containing multiple discrete subparts, which would cause TruePosition to exceed the maximum number of written Interrogatories allowed under Rule 33(a) of the Federal Rules of Civil Procedure. Andrew limits its response to the entities named specifically in the Interrogatory. Furthermore, portions of this answer may be

derived from business records that Andrew has produced, and according to rule 33(d) the burden of deriving the response is substantially the same for each party.

Subject to and without waiving its Specific and General Objections, Andrew states that a Cellular Telephone Location System has not been deployed at ICT/Q-Tel. Andrew is in the process of deploying a Geometrix® system at STC (Saudi Telephone Company):

- One GCS has been provided to STC.

- One GCS has been installed in Saudi Arabia.

- One GCS is available for use.

- Software release 2005.2.1000 is currently in the deployment and test phase at STC, and has not yet been accepted.

- Andrew has shipped enough equipment to install at 983 cell sites. Currently STC has released Andrew to install equipment at 598 cell sites.

- Andrew refers TruePosition to its documents to ascertain other portions of this Interrogatory.

GENERAL OBJECTIONS.

1.   Andrew objects to TruePosition's Interrogatories to the extent that they seek information protected from discovery by the attorney-client privilege, attorney work product doctrine, the joint defense privilege or any other applicable privilege or doctrine. Any disclosure of such protected or privileged information is inadvertent and not intended to waive those privileges or protections.
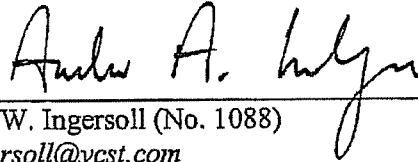
2.   Andrew objects to the definition of "Andrew" on the grounds that it is overbroad and unduly burdensome to the extent that, in combination with specific Interrogatories using the term, it purports to require Andrew to provide information that is not known by Andrew.

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3.   Andrew further objects to the definition of "Andrew" to the extent that it includes persons or entities other than Andrew Corporation and agents acting on its behalf on the grounds that such definition renders the Interrogatories overbroad and unduly burdensome. For purposes of responding to these Interrogatories, Andrew will interpret "Andrew" to mean Andrew Corporation and agents acting on its behalf.

4.   Andrew objects to the definition of "Business Entity" on the grounds that it is circular, vague, and ambiguous. For purposes of responding to these Interrogatories, Andrew will interpret "Business Entity" to mean any partnership, corporation, proprietorship, association, subsidiary, division, joint venture, or company, including governmental bodies and agencies and any other business organizations, whether formal or informal.

5.   Andrew objects to TruePosition's instructions to the extent that they purport to impose obligations in excess of those imposed by Fed. R. Civ. P. 33.

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Dated: November 17, 2006

CERTIFICATE OF SERVICE

I, Andrew A. Lundgren, Esquire, hereby certify that on November 17, 2006, I caused copies of the foregoing document to be served upon the following counsel in the manner indicated:
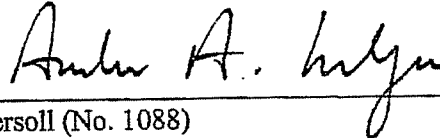
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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

TRUEPOSITION INC.,	)	
	)	
PLAINTIFF/	)	
COUNTERCLAIM- DEFENDANT,	)	
	)	
	)	
v.	)	CIVIL ACTION NO. 05-00747-SLR
	)	
ANDREW CORPORATION,	)	
	)	
DEFENDANT/	)	
COUNTERCLAIM-PLAINTIFF.	)	

ANDREW CORPORATION'S SUPPLEMENTAL RESPONSES TO TRUEPOSITION'S FIRST SET OF INTERROGATORIES

Pursuant to Rules 26(e) and 33 of the Federal Rules of Civil Procedure, Andrew

Corporation hereby supplements its responses to TruePosition's First Set of Interrogatories.

Pursuant to Rule 26(e) of the Federal Rules of Civil Procedure, Andrew expressly reserves the

right to supplement these responses further.

Interrogatory No. 1

Identify by name, trade designation. and/or model number. each line, type, or version of Cellular Telephone Location System, or component thereof, made, used. sold, or offered for sale in or from the United States, or imported into the United States, by Andrew since January 1, 2004, and identify, separately, the Person most knowledgeable at Andrew with respect to such manufacture, use, sale, offer for sale, and/or importation of each identified Cellular Telephone Location System or component, and the Person most knowledgeable at Andrew with respect to the U-TDOA functionality of each identified Cellular Telephone Location System or component.

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